

1 Counsel listed on next pages
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6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8

9 Jeremy Stanfield, Romonia Persaud, Shabnam
10 Sheila Dehdashtian, Saira Losoya, Eva
11 Williams, Corby McNay, Melissa Michel,
12 Richelle Pica, Scot Robbins, Mark Yehle, Eric
Dorsett, individually, on behalf of all others
similarly situated, and on behalf of the general
public,

13 Plaintiffs,

14 v.

15 First NLC Financial Services, LLC, and
16 DOES 1 through 50 inclusive,

17 Defendants.
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Case No. C 06-3892 SBA JL

**CONSENT TO AMEND COMPLAINT
UNDER FED.R.CIV.P. 15(a),
STIPULATION TO TOLL CLAIMS OF
FUNDERS, AND [PROPOSED] ORDER**

Judge: Hon. Sandra B. Armstrong

Date Action Filed: June 22, 2006

CONSENT TO AMEND COMPLAINT, STIPULATION
TO TOLL CLAIMS OF FUNDERS,
AND [PROPOSED] ORDER
C 06 3892 SBA

PETER RUKIN (State Bar No. 178336)
JOHN HYLAND (State Bar No. 178875)
RUKIN HYLAND DORIA & TINDALL, LLP
100 Pine Street, Suite 725
San Francisco, CA 94111
Telephone: (415) 421-1800
Facsimile: (415) 421-1700

DONALD H. NICHOLS (MN State Bar No. 78918)
(Admitted *pro hac vice*)
PAUL J. LUKAS (MN State Bar No. 22084X)
(Admitted *pro hac vice*)
RACHHANA T. SREY (MN State Bar No. 3401433)
(Admitted *pro hac vice*)
MATTHEW C. HELLAND (MN State Bar No. 346214)
(Admitted *pro hac vice*)
4600 IDS Center
80 South Eighth Street
Minneapolis, MN 55402

BRYAN J. SCHWARTZ (State Bar No. 209903)
NICHOLS KASTER & ANDERSON, LLP
One Embarcadero Center
Suite 720
San Francisco, CA 94111
Telephone: (415) 277-7236
Facsimile: (415) 277-7238

Attorneys for Individual and Representative Plaintiffs

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TO TOLL CLAIMS OF FUNDERS,
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C 06 3892 SBA

1 TIMOTHY J. LONG (State Bar No. 137591)
2 ORRICK, HERRINGTON & SUTCLIFFE LLP
3 400 Capitol Mall, Suite 3000
4 Sacramento, California 95814
5 Telephone: (916) 447-9200
6 Facsimile: (916) 329-4900
7 E-mail: tjlong@orrick.com

8 MICHAEL D. WEIL (State Bar No. 209056)
9 KATINA B. BOOSALIS (State Bar No. 244914)
10 ORRICK, HERRINGTON & SUTCLIFFE LLP
11 405 Howard Street
12 San Francisco, CA 94105
13 Telephone: (415) 773-5700
14 Facsimile: (415) 773-5759
15 E-mail: mweil@orrick.com
16 E-mail: kboosalis@orrick.com

17 STEPHEN G. MORRISON (Admitted *Pro Hac Vice*)
18 NELSON MULLINS RILEY & SCARBOROUGH LLP
19 Meridian, 17th Floor
20 1320 Main Street
21 Columbia, SC 29201
22 Telephone: (803) 255-9410
23 Facsimile: (803) 255-9472
24 E-mail: steve.morrison@nelsonmullins.com

25 KENNETH E. YOUNG (Admitted *Pro Hac Vice*)
26 NELSON MULLINS RILEY & SCARBOROUGH LLP
27 100 N. Tryon Street, 42nd Floor
28 Charlotte, NC 28202
Telephone: (704) 417-3041
Facsimile: (704) 417-3012
E-mail: ken.young@nelsonmullins.com

Attorneys for Defendant
First NLC Financial Services, LLC

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C 06 3892 SBA

1 Under Fed.R.Civ.P. 15(a), a party may amend a Complaint at any time by written consent of the
2 adverse party.

3
4 The Parties hereby agree that Plaintiff shall file on July 24, 2007 the Fourth Amended Complaint
5 in this matter, adding the job title of "funders" who worked in California to the complaint, and
6 adding as named Plaintiffs Derena Sparrow-Milrot, Yvette Lawrence, and Jolene Hunt-Fleming.
7 The Fourth Amended Complaint shall also clarify that the position of "account executives" in the
8 complaint is intended to reference "inside account executive;"
9

10 Defendant has denied and continues to deny each of the claims and contentions alleged by
11 Plaintiffs in this matter, denies any wrongdoing or legal liability arising out of any of the facts or
12 conduct alleged in this matter, believes that it has valid defenses to Plaintiffs' claims, contends
13 that all of its employees have been compensated in compliance with the law, and that its conduct
14 was not willful with respect to the classification of employees as exempt.
15

16 After the Court docketes the Fourth Amended Complaint and accepts the Stipulation below,
17 Plaintiffs intend to withdraw the case of *Derena Sparrow-Milrot, et al v. First NLC Financial*
18 *Services, LLC*, United States District Court for the Central District of California, case No.
19 SACV07-0119 AHS (RCx).
20

21 In the event the Court does not certify a Rule 23 class action on behalf of the California funders,
22 which the parties will requested as part of a settlement currently being finalized, and which will
23 toll the statute of limitations to June 22, 2002 for all California funders' claims, then the parties
24 stipulate, and Defendant will at no time dispute, that funders who opted-into the matter of *Derena*
25 *Sparrow-Milrot, et al v. First NLC Financial Services, LLC*, United States District Court for the
26 Central District of California, case No. SACV07-0119 AHS (RCx), shall have their claims tolled
27 to the dates they opted into that matter.
28

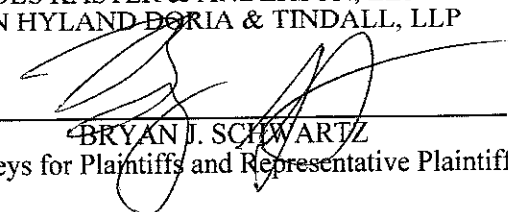
CONSENT TO AMEND COMPLAINT, STIPULATION
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The individuals who opted-into the matter of *Sparrow-Milrot, et al v. First NLC Financial Services, LLC*, United States District Court for the Central District of California, case No. SACV07-0119 AHS (RCx) shall be included in this matter.

Last Name	First Name	Middle Name	Actual Filing Consent Date
Alvarado	Ruben		01/30/2007
Barnes	Cassandra		01/30/2007
Drew	Desiree		03/08/2007
Hood	Samantha		03/21/2007
Hunt -Fleming	Jolene		03/02/2007
Judge	Barbara		04/04/2007
Ketchersid-Eagle	Lori		01/30/2007
Kien	Julie		01/30/2007
Lawrence	Yvette		01/30/2007
Murphy	Sharon		01/30/2007
Ramirez	Ramon		01/30/2007
Romolo	Victoria		03/02/2007
Russell	Jessica		04/12/2007
Silva	Orlando		01/30/2007
Sparrow-Milrot	Derena		01/30/2007

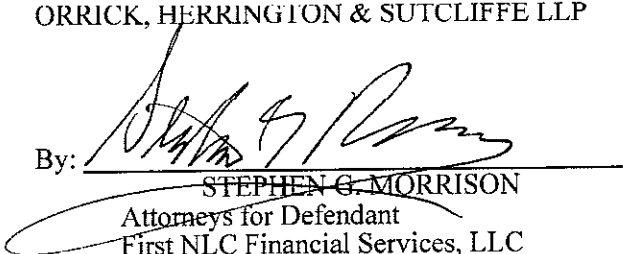
Dated: 7/24/07

NICHOLS KASTER & ANDERSON, PLLP
NICHOLS KASTER & ANDERSON, LLP
RUKIN HYLAND-DORIA & TINDALL, LLP

By: 
BRYAN J. SCHWARTZ
Attorneys for Plaintiffs and Representative Plaintiffs

Dated: 7/24/07

NELSON MULLINS RILEY & SCARBOROUGH
LLP
ORRICK, HERRINGTON & SUTCLIFFE LLP

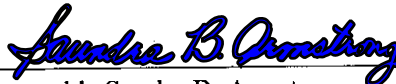
By: 
STEPHEN G. MORRISON
Attorneys for Defendant
First NLC Financial Services, LLC

CONSENT TO AMEND COMPLAINT, STIPULATION
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ORDER

Pursuant to the parties' stipulation, it is ORDERED that individuals who opted-into the matter of *Derena Sparrow-Milrot, et al v. First NLC Financial Services, LLC*, United States District Court for the Central District of California, case No. SACV07-0119 AHS (RCx), shall have their claims tolled to a date no later than the dates on which they opted-into that matter.

Dated: 8/2/07


Honorable Sandra B. Armstrong
United States District Court Judge

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